

Director's Order graphic

DIRECTOR'S ORDER #58: STRUCTURAL FIRE MANAGEMENT

Approved: A. Durand Jones
(for) Director

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This is a renewal of Director's Order 58, which was first approved January 19, 2001. Together with Reference Manual 58 (RM-58), Director's Order 58 superseded and replaced National Park Service Guideline 58, "Structural Fire" (Release No. 1, June 1987), and any other previously issued policy or procedural statements relating to structural fire management.

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I. Purpose and Background

The purpose of this Director's Order is to supplement the structural fire policy articulated in National Park Service Management Policies by setting forth the operational policies and procedures necessary to establish and implement structural fire management programs throughout the national park system.

Since 1990, structural fires have caused significant damage to National Park Service property. These fires have also resulted in deaths and numerous injuries. Professional structural fire management programs are essential to the protection of human life, personal property and irreplaceable cultural resources.

Structural fire management is defined as the protection of people, content, structures, resources, and the landscape surrounding the structure from the effects of fire. At the park level, a fully implemented and documented structural fire prevention program is the most effective way to achieve that goal.

II. Authority

Authority to issue this Director's Order is contained in the National Park Service Organic Act (16 U.S.C. §1 through 4), and the delegation of authority contained in Part 245 of the Department of the Interior Manual (DM).

III. Management Policies

The sections of National Park Service Management Policies that address structural fires include:

5.3.1 Protection and Preservation of Cultural Resources: The National Park Service will employ the most effective concepts, techniques, and equipment to protect cultural resources against theft, fire, vandalism, overuse, deterioration, environmental impacts, and other threats, without compromising the integrity of the resources.

5.3.1.1 Emergency Management: Measures to protect or rescue cultural resources in the event of an emergency, disaster, or fire will be developed as part of a park's emergency operations and fire management planning processes. Designated personnel will be trained to respond to all emergencies in a manner that maximizes visitor and employee safety and the protection of resources and property.

5.3.1.2 Fire Detection, Suppression, and Post-fire Rehabilitation and Protection: The NPS will take action to prevent or minimize the impact of wildland, prescribed, and structural fires on cultural resources, including the impact of suppression and rehabilitation activities.

In the preservation of historic structures and museum and library collections, every attempt will be made to comply with national building and fire codes. When these cannot be met without significantly impairing a structure's integrity and character, the management and use of the structure will be modified to minimize potential hazards, rather than modifying the structure itself.

Subject to the previous paragraph, when warranted by the significance of a historic structure or a museum or library collection, adequate fire detection, warning, and suppression systems will be installed. "Pre-fire plans" will be developed for historic structures and buildings housing museum or

library collections, designed to identify the floor plan, utilities, hazards, and areas and objects requiring special protection. This information will be kept current and made available to local and park fire personnel.

Park and local fire personnel will be advised of the locations and characteristics of cultural resources threatened by fire, and of any priorities for protecting them during any planned or unplanned fire incident. At parks with cultural resources, park fire personnel will receive cultural resource protection training. At parks that have wildland or structural fire programs, cultural resource management specialists will receive fire prevention and suppression training and, when appropriate, will be certified for incident management positions commensurate with their individual qualifications.

Smoking will not be permitted in spaces housing museum or library collections, or in historic structures (except those used as residences in which smoking is permitted by the park superintendent). (See also [Director's Order #50D: Smoking Policy](#))

9.1.8 Structural Fire Protection and Suppression: Superintendents will manage structural fire activities as part of a comprehensive interdisciplinary effort to protect resources and promote the safe and appropriate public enjoyment of those resources. Fire prevention, protection, and suppression will be primary considerations in the design, construction, rehabilitation, maintenance, and operation of all facilities. Structural fires will be suppressed to prevent the loss of human life and minimize damage to property and resources. The Service's Structural Fire Protection and Suppression Program will provide, through Director's Order #58 and Reference Manual 58, additional policy, standards, operational procedures, and accountability to meet the diverse needs and complexities of individual parks. The goal is to ensure that all national park areas receive an appropriate level of fire protection, provided in a safe and cost-effective manner by qualified personnel.

Each superintendent will complete a structural fire assessment and develop a structural fire plan to meet park needs. Structural fire protection and suppression capabilities will be maintained in accordance with those plans. Prevention priorities will focus on occupied structures and cultural resources, with emphasis placed evenly on code compliance, early warning detection, suppression systems, and employee training and awareness.

Fire prevention through code-compliant new construction, upgrading of existing structures, standardized and regularly scheduled fire inspections, and properly installed and maintained detection and suppression systems will be the primary means of addressing and correcting NPS structural fire deficiencies. Where these measures are not sufficient to meet park needs, aid agreements will be entered into with non-NPS entities capable of providing requisite fire suppression. Support from neighboring fire protection organizations is encouraged, and superintendents should enter into appropriate agreements whenever possible to enhance fire-fighting capabilities. Development of a park fire brigade will be considered only when all other options have been explored and found unacceptable.

9.4.2 Museum Collections Management Facilities: Park curatorial facilities should be adapted to the needs of each park. They may share space in visitor centers or administrative office buildings, or be housed in completely separate buildings. Incorporation with maintenance facilities should be avoided

because of the heightened danger of fire, chemical spills, and similar accidents. Curatorial facilities will meet each collection's special requirements for security, fire suppression, and environmental controls.

IV. Operational Policies and Procedures

A. Life safety is, and will at all times be, the first priority in all National Park Service fire management activities.

B. The National Park Service is committed to protecting all resources entrusted to its care, and will focus on preventing fires and minimizing the damage resulting from fires. This will be accomplished with the clear understanding that life safety is the first priority.

C. To implement Management Policies governing structural fire management, the National Park Service will administer its structural fire program in a manner that will:

1. Focus on preventing and minimizing the damage resulting from structural fires;
2. Educate employees and park partners about structural fire prevention, resource protection, and hazardous conditions;
3. Maintain the highest standards of professional and technical expertise in planning and safely implementing an effective structural fire management program;
4. Integrate structural fire prevention practices with all other aspects of park management;
5. Manage structural fire incidents in accordance with recognized national standards, using appropriate management strategies and tactics;
6. Evaluate all proposed new facility construction to determine if structural fire protection is necessary or possible;
7. Use the best available technology to detect and provide early warning of fires, prevent, and suppress structural fires; and
8. Effectively integrate the preservation of cultural and natural resources with suppression actions through the use of "minimum impact" techniques.

D. All National Park Service structural fire activities will comply with the requirements of:

1. This Director's Order and Reference Manual 58 (RM-58);
2. 5 U.S.C. §7902 (Safety Program);
3. 15 U.S.C. §2225 (Fire Prevention and Control);
4. 29 U.S.C. §668 (Occupational Safety and Health);
5. 40 U.S.C. §619; (Construction, Alteration, and Acquisition of Public Buildings);
6. 29 CFR Part 1910 (Occupational Safety and Health Standards);
7. 29 CFR Part 1926 (Safety and Health Regulations for Construction);
8. 29 CFR Part 1960 (Program Elements for Federal Employee Safety and Health);
9. 43 CFR Part 28 (Fire Protection Emergency Assistance);
10. 411 DM (Museum Property Handbook, Volume 1, Preservation and Protection of Museum Property);

11. National Historic Preservation Act, Section 106, and 36 CFR 800;
12. 485 DM 19 (Fire Safety); and
13. Executive Order 13058 ("Protecting Federal Employees and the Public from Exposure to Tobacco Smoke in the Federal Work Place," August 9, 1997).

Director's Orders #12: Conservation Planning, Environmental Impact Analysis, and Decision-making; #28: Cultural Resource Management; #48: Concessions Management; and #50B: Risk Management, must also be considered.

E. The Associate Director for Visitor and Resource Protection will prepare and issue a reference manual ([RM-58](#)) to help National Park Service managers and field staff understand and implement Departmental and Service policies applicable to structural fire management. RM-58 will contain detailed procedures emphasizing life safety, fire prevention, and suppression activities; it will also include training and certification requirements.

F. The Associate Director for Visitor and Resource Protection will appoint the National Park Service Structural Fire Program Manager. The Program Manager will provide leadership and direction to ensure effective Service-wide implementation and administration of the program, and will disseminate information regarding advances and developments in structural fire and fire technology.

G. The Superintendent of each park will designate a park structural fire coordinator, whose training and certification requirements will be identified in RM-58. The park structural fire coordinator will ensure that RM-58 is available in sufficient quantities to serve the needs of structural fire management staff within the park, and will ensure that fire management staff is adequately versed in the policies and procedures contained therein.

H. A comprehensive Structural Fire Condition Assessment (FPCA) will be conducted on all buildings Service-wide in order to provide guidance to superintendents implementing structural fire programs.

I. The National Park Service hereby adopts, and will enforce as minimum standards, the most current version of the National Fire Protection Association (NFPA)'s Fire Prevention Code (NFPA 1), Life Safety Code (NFPA 101), and all other associated codes and standards. The purpose of these codes is to prescribe minimum requirements necessary to establish a reasonable level of fire safety, and to protect property from the hazard created by fire.

J. National Park Service-adopted standards may be at variance with state and/or local fire safety codes. Where conflicts arise between codes and standards, the Service will adhere to the more stringent requirement(s). The Service recognizes that not all structures will be in full compliance with the more stringent standards; but it is the Service's goal to bring all structures into compliance.

K. Regional Directors are hereby designated as the Authority Having Jurisdiction (AHJ), as defined in NFPA 1, within their respective regions. AHJs will be the individual responsible for approving equipment, materials, an installation, or a procedure regarding structural fire. This authority may be re-

delegated to the regional structural fire management officer. The AHJ will be responsible for resolving conflicts between codes or standards.

L. Fire may be used to remove a structure when all safety, health, economic, and environmental considerations have been met and it has been determined that it is beneficial to the park for providing the training of fire suppression forces. Specific guidelines for using fire to remove structures will be defined in Reference Manual 58.

V. Program Requirements

To further implement Management Policies governing structural fire management activities, and to comply with the principles, policies, and recommendations of the "Review of National Fire, Aviation and Emergency Response" report (May 18, 1998, National Park Service), the Service adopts the following program requirements:

A. Structural Fire Management Planning

1. Each superintendent will ensure the completion of a comprehensive FPCA for all buildings and the development of a structural fire management plan in accordance with procedures and timelines outlined in the Reference Manual 58. The FPCA is a standardized process of evaluating the fire safety of individual buildings. The structural fire management plan identifies the current situation, deficiencies and direction being taken to correct the deficiencies.

Once the structural fire management plan is approved by the superintendent, the plan will be reviewed by the regional AHJ to ensure that the plan:

- a. Has life safety as its first priority.
- b. Includes structural fire management objectives that protect life, property, and resources.
- c. Has been developed with internal and external interdisciplinary input, and reviewed by appropriate subject matter experts.
- d. Includes a comprehensive structural fire prevention analysis.
- e. Designates a park structural coordinator.

2. The installation, inspection, and maintenance of all fire detection and suppression equipment will be performed and documented in accordance with statutory and regulatory requirements, applicable NFPA standards, and Director's Order #50B.

3. Changes recommended by Structural Fire Management Plans that involve historic structures or historic landscapes will comply with State Historic Preservation Office requirements.

B. Safety and Health

1. Life safety will be the first priority in all structural fire management activities.
2. Structural fire suppression personnel will:

- a. meet appropriate qualifications for incident assignments;
- b. be equipped with personal protective clothing and equipment that meets OSHA and NFPA standards;
- c. meet the medical standards specified in NFPA 1582 Medical Requirement for Fire Fighters.

3. Structural fire prevention positions require:

- a. considerable walking, bending and lifting;
- b. exposure to attics, crawl spaces and low ceilings;
- c. exposure to areas common to rats, mice, bats and animals that often carry diseases.

4. Structural fire apparatus will comply with standards set forth in NFPA 1901 standards.

C. Structural Protection from Wildland Fire

The FPCA will identify if there is adequate vegetation clearances around structures needed to provide protection from wildland fires.

Structural Fire Management will ensure integration with Wildland Fire Management, Facility Management and Cultural and Natural Resources on issues of vegetation management needed for the protection of structures.

D. Cultural Resources

1. The National Park Service structural fire program will protect from damage or loss, to the greatest extent possible, cultural resources, including historic and prehistoric structures, museum and archival collections, and associated collection records.
2. Structural fire management programs involving cultural resources will comply with appropriate NFPA codes and standards.
3. Due to the many considerations involved in working with historic structures, all efforts to protect such structures must be multi-disciplinary in approach. It is important that all the disciplines involved in preserving and maintaining historic structures-such as Facility Management, Cultural Resources, and others-are included in decisions involving the structural fire safety of historic buildings.
4. Collection areas will be provided early warning detection and suppression systems in compliance with applicable NFPA codes and standards.
5. Specific requirements for automatic suppression systems and detection equipment will be provided in Reference Manual 58.

E. Natural Resources

1. The National Park Service structural fire program will protect from damage or loss, to the greatest extent possible, natural resources and values.
2. Due to the many considerations involved in working with natural resources, all efforts that may affect them must be multi-disciplinary in approach. It is important that all the disciplines involved in managing

flammable vegetation-such as Natural Resources and Wildland Fire Management, and others-are included in decisions involving the structural fire safety of surrounding buildings.

F. Concessions

1. Concession operations will comply with NFPA codes and standards and the requirements specified in this Director's Order.
2. Concessionaires are responsible for conducting building inspections and maintenance of detection, alarm and suppression systems of those buildings assigned to them. The National Park Service will ensure that structural fire inspections and the maintenance of protection systems occur through the concessions management evaluation process in cooperation with the structural fire management program.
3. Concession-operated fire brigades participating in structural fire suppression must meet the training and certification requirements specified in this Director's Order and RM-58.
4. Concession-operated fire brigades may operate only pursuant to a formal written structural fire aid agreement with the park.

G. Reporting

1. All National Park Service structural fires involving incident response, suppression action, or destruction of property must be reported in accordance with the requirements of RM-58.
2. Fire inspections, violations, systems testing and fire protection activities require documentation in accordance with the requirements of RM-58.
3. Records are to be maintained at the park in accordance with the requirements of RM-58.

H. Investigation

1. All structural fire incidents will be investigated in accordance with the requirements of RM-58.
2. The regional director will establish a structural fire review team within 24 hours of any incident that results in a fatality or a significant loss, or that is considered controversial or unusual. Review team procedures will be in accordance with RM-58.

I. Training, Qualification, and Certification

1. All National Park Service staff, concessionaire employees, volunteers, and park partners participating in structural fire prevention or suppression must meet the training and certification requirements specified in this Director's Order and RM-58.
2. Individual training and certification levels will be based on park complexity and will be identified in RM-58.
3. Park structural fire coordinator will meet training requirements based upon the complexity of the park's program.
4. National Park Service structural fire classes will be identified in RM-58. Course participants must successfully complete all objectives as outlined for each individual class. This will include written and, where appropriate, practical examinations.
5. In order to remain qualified, National Park Service structural fire personnel must maintain their skills by periodically attending fire-related training, and/or undergoing certification testing as identified in RM-58.
6. Periodic live fire training exercises are required for all fire suppression positions. Live fire training

will be conducted in accordance with the NFPA standards identified in RM-58.

7. All structural fire suppression personnel must undergo medical examination, and successfully complete physical fitness and self-contained breathing apparatus fit tests in accordance with RM-58.

8. Park superintendents are responsible for verifying and certifying that their structural fire suppression personnel meet the position training and certification standards specified in this Director's Order and RM-58.

9. All structural fire suppression personnel will have their training and qualification records entered into a National Park Service database system specified in RM-58.

10. All structural fire instructors must meet the instructor qualification standards specified in RM-58. A log of courses taught will be entered into a National Park Service database system for each instructor.

J. Interagency Coordination

1. Superintendents of parks that rely on non-NPS entities for fire suppression will pursue assistance or mutual aid agreements with the primary responding agencies. At a minimum, fire suppression pre-plans will be written and training will be conducted to ensure that response times are appropriate, and strategies and tactics are developed to protect park resources to the greatest extent possible.

2. A solicitor must review for legal sufficiency all agreements involving an obligation of funds or assumption of liability. Procedures established by Director's Order #20: Agreements, will be followed if National Park Service funds will be obligated.

3. Agreement examples and format can be found in RM-58.

K. Park Program Review

Park structural fire programs will be reviewed for quality and effectiveness by the AHJ on a regularly established schedule that will be determined by individual park complexity and identified in RM-58.

L. Preparedness

Superintendents will ensure (1) that all employees have the opportunity to receive basic structural fire prevention training as referenced in RM-58, and (2) that those employees capable of and interested in structural fire activities, including prevention and suppression, are made available for those activities.

M. Funding

Funding will be established based on priorities identified by a standardized park structural fire assessment.

----- End of Director's Order -----